

EXHIBIT “4”

1 **LIEN**

2 Sean K. Claggett, Esq.
 3 Nevada Bar No. 008407
 4 Jennifer Morales, Esq.
 5 Nevada Bar No. 008829
 6 CLAGGETT & SYKES LAW FIRM
 7 4101 Meadows Lane, Suite 100
 8 Las Vegas, Nevada 89107
 9 (702) 655-2346 – Telephone
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13 **DISTRICT COURT**
 14 **CLARK COUNTY, NEVADA**

15 LOGAN ERNE, an Individual,

16 Plaintiff,

17 CASE NO.: A-18-773499-C

18 v.
 19 MARGARET WILLIAMS, LPCC an Individual;
 20 MARILYN S. ABEL, CPC, an Individual;
 21 ANTHONY QUINN, M.D., an Individual,
 22 BRANDON PAYZANT, PAC, PHC OF
 23 NEVADA, INC. DBA HARMONY
 24 HEALTHCARE, a foreign corporation; and
 25 SUMMERLIN HOSPITAL & MEDICAL
 26 CENTER LLC, a limited liability company.;
 27 DOES I through X; ROE BUSINESS ENTITIES
 28 XI through XX, inclusive,

Defendants.

NOTICE OF ATTORNEY'S LIEN

NOTICE IS HEREBY GIVEN that CLAGGETT & SYKES LAW FIRM claims a lien for its services upon the claims for relief on behalf of LOGAN ERNE, and any successor and/or predecessor plaintiff in the above-referenced litigation, against any person, entity or insurance company legally liable for damages as a result of the incident occurring on April 26, 2017, that is now the subject of this lawsuit.

Claggett & Sykes Law Firm claims a lien and upon any and all property or gross amounts recovered (the recovery) that may become available on behalf of LOGAN ERNE and any successor and/or predecessor plaintiff in the above-referenced litigation:

Jennifer Morales, Esq.	97.20 hours/\$72,900.00
Shannon L. Wise, Esq.	69.70 hours/\$27,880.00
Samuel Harding, Esq.	23.05 hours/\$17,287.50
Moises Garcia	32.50 hours/\$4,875.00
Jocelyn Abrego	48.70 hours/\$7,305.00
Total:	271.15 hours/\$130,247.50

Claggett & Sykes Law Firm asserts a lien for attorney fees in the amount of **\$130,247.50**.

Claggett & Sykes Law Firm also asserts a lien against LOGAN ERNE for all reasonable case costs advanced and incurred on behalf of the plaintiff in the amount of **\$158,264.56**

Accordingly, Claggett & Sykes Law Firm asserts a total lien in this matter of **\$288,512.06** for attorney fees and costs.

DATED this 16th day of February 2021.

CLAGGETT & SYKES LAW FIRM

/s/ Sean K. Claggett

Sean K. Claggett, Esq.
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT on the 16th day of February 2021, I caused to be served a true and correct copy of the **NOTICE OF ATTORNEY'S LIEN** in the above-captioned case via the following methods pursuant to Rule 9 of the N.E.F.C.R. and N.R.C.P. 5:

<p>Robert C. McBride, Esq. Gerald Tan, Esq. CARROLL KELLY TROTTER FRANZEN MCBRIDE & PEABODY 8329 W. Sunset Road, Suite 260 Las Vegas, NV 89113</p> <p><i>Attorneys for Defendant Anthony Quinn, M.D.</i></p>	<p>Travis E. Shetler, Esq. LAW OFFICES OF TRAVIS E. SHETLER 3202 W. Charleston Blvd Las Vegas, NV 8902 <i>Attorneys for Plaintiff</i></p>
<p>S. Brent Vogel, Esq. LEWIS BRISBOIS BISGAARD & SMITH, LLP 6385 S. Rainbow Blvd., Suite 600 Las Vegas, NV 89118</p> <p><i>Attorneys for Defendants Margaret Williams, LCPC, Marilyn S. Abel, CPC, Brandon Payzant, PAC and PHC of Nevada, Inc., dba Harmony Healthcare.</i></p>	<p>Brian F. Davis, Esq. DAVIS LAW GROUP, PA 135 Cherry Street, N Asheville, NC 28801 <i>Attorneys for Plaintiff</i></p>
<p>Michael J. Shannon, Esq. Brittany A. Lewis, Esq. HALL PRANGLE & SCHOONVELD, LLC. 1140 North Town Center Drive, Ste. 350 Las Vegas, Nevada 89144</p> <p><i>Attorneys for Defendant, Summerlin Hospital Medical Center, LLC</i></p>	<p>VIA Regular and Certified Mail Logan Erne 51 Wilmington Street, Ashville, North Carolina 28806 <i>Plaintiff</i></p>
<p>Candance C. Herling, Esq. MESSNER REEVES, LLP 8945 W. Russell Road #300 Las Vegas, NV 89148</p> <p><i>Attorneys for Defendant, Summerlin Hospital Medical Center, LLC</i></p>	

/s/ Moises Garcia

An Employee of Claggett & Sykes Law Firm